

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: :  
CHRISTOPHER J. CURRY : CHAPTER 13  
Debtor. :

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BARCLAYS MORTGAGE TRUST :  
2021-NPL1, MORTGAGE BACKED :  
SECURITIES SERIES 2021-NPL1, BY US :  
BANK NA, AS INDENTURE TRUSTEE :  
Movant, :

vs. :  
CHRISTOPHER J. CURRY : CASE NO. 5-21-00847  
Respondents. :

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**DEBTOR'S ANSWER TO MOTION FOR RELIEF FROM  
AUTOMATIC STAY UNDER SECTION 362**

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AND NOW COMES, Christopher J. Curry, the Debtor, and files an Answer to Barclay's  
Mortgage Trust, et al's Motion for Relief From the Automatic Stay:

1. Christopher J. Curry (hereinafter the "Debtor") filed a Chapter 13 bankruptcy proceeding with the U.S. Bankruptcy Court for the Middle District of Pennsylvania.
2. Movant alleges that Debtor has failed to make post-petition mortgage payments.
3. Debtor's Counsel is in the process of contacting the Debtor to ascertain if the payments have been made and/or in the alternative if the Debtor is in possession of the funds needed to cure the alleged default.
4. In the event there remains an arrears, the Debtor wishes to enter into a Stipulation to cure the arrears over a six (6) month period and/or include the arrears in an amended Chapter 13 Plan.

5. Movant is not entitled to relief from the automatic stay as the arrearage amount due has been paid or shall be paid through the Chapter 13 Plan, and/or a six (6) month Stipulation, and, therefore, the Movant is adequately protected.

WHEREFORE, the Debtor respectfully requests that Movant's Motion for Relief from the Automatic Stay be denied.

Respectfully submitted,

Date: April 28, 2023

/s/Tullio DeLuca  
Tullio DeLuca, Esquire  
PA ID# 59887  
381 N. 9<sup>th</sup> Avenue  
Scranton, PA 18504  
(570) 347-7764

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**CERTIFICATE OF SERVICE**  
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The undersigned hereby certifies that on April 28, 2023, he caused a true and correct copy of Debtor's Answer to Barclays Mortgage Trust, et al's Motion for Relief from the Automatic Stay to be served Via First Class United States Mail, Postage Pre-paid in the above-referenced case, on the following:

Jack N. Zaharopoulos, Esq. at [info@pamd13trustee.com](mailto:info@pamd13trustee.com)

Karina Velter, Esq. at [bankruptcy@powerskirn.com](mailto:bankruptcy@powerskirn.com)

Dated: April 28, 2023

/s/Tullio DeLuca  
Tullio DeLuca, Esquire